

# Exhibit 3



Elizabeth M. Muldowney  
Attorney

Direct: (804) 783-7227  
E-mail: EMuldowney@SandsAnderson.com

RICHMOND • MCLEAN • FREDERICKSBURG  
CHRISTIANSBURG • RALEIGH  
SANDS ANDERSON PC

WWW.SANDSANDERSON.COM

1111 East Main Street  
Post Office Box 1998  
Richmond, Virginia 23218-1998  
Main: (804) 648-1636  
Fax: (804) 783-7291

December 7, 2017

Andrew R. Tate, Esq. (atate@nexuscaridades.com)  
Mario B. Williams, Esq. (mwilliams@nexuscaridades.com)  
Nexus Caridades Attorneys Inc.  
44 Broad Street, NW  
Suite 200  
Atlanta, GA 30303

Via Electronic Mail

**RE: Riggleman v. Clarke, et al.**  
**Civil action no. 5:17cv00063**

Dear Mr. Tate:

I am in receipt of your letter dated December 6, 2017, seeking a stipulation regarding expedited discovery in the above-referenced matter. Unfortunately, we cannot stipulate to all of the discovery requested. The sheer breadth of your request is impossible to achieve in the 40 days prior to the hearing scheduled for January 18, 2018, based on our and our clients' schedule, and is therefore prejudicial to the defendants and unreasonable.

Notwithstanding, we will agree to provide you with the VDOC Guidelines for Treatment of Hepatitis C from 2015 to the present, which represent the policy/procedure/protocol for treatment of hepatitis C positive offenders in VDOC custody since 2015. In addition, if the plaintiff will significantly revise and reduce this discovery requested we will certainly reconsider entering into a stipulation.

Please contact me if you would like to discuss this further.

Very truly yours,

A handwritten signature in cursive script that reads "Elizabeth M. Muldowney".

Elizabeth M. Muldowney

EMM/

cc: Edward J. McNelis, III